



August 21, 2023

BSE Limited

Department of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

National Stock Exchange of India Limited

The Listing Department,
Exchange Plaza,
Bandra Kurla Complex,
Mumbai – 400 051

Scrip Code: 543396

Symbol: PAYTM

Sub: Disclosure under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015) - Business Responsibility and Sustainability Report for the financial year 2022-23

Dear Sir / Ma'am,

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility and Sustainability Report of the Company for the financial year 2022-23 which also forms part of the Annual Report for the financial year 2022-23.

This disclosure will also be hosted on the Company's website viz. www.paytm.com.

Kindly take the same on record.

Thanking you

Yours faithfully,

For One 97 Communications Limited

Sunil Kumar Bansal
Company Secretary & Compliance Officer

Encl.: As above

Business Responsibility & Sustainability Report

Section A – General Disclosures

Details of the Listed entity

| | | |
|----|--|--|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | L72200DL2000PLC108985 |
| 2 | Name of the Listed Entity | One 97 Communications Limited |
| 3 | Year of incorporation | 2000 |
| 4 | Registered office address | First Floor, Devika Tower, Nehru Place, New Delhi – 110019 |
| 5 | Corporate address | One Skymark, Tower D, Plot No. H-10B, Sector-98, Noida-201304 |
| 6 | E-mail | compliance.officer@paytm.com |
| 7 | Telephone | +91-120- 4770770 |
| 8 | Website | www.paytm.com |
| 9 | Financial year for which reporting is being done. | FY 2022-23 |
| 10 | Name of the Stock Exchange(s) where shares are listed. | The Equity shares of the Company are listed and traded on National Stock Exchange of India Limited and BSE Limited |
| 11 | Paid-up Capital (₹) | Rs. 63,37,88,217 |
| 12 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report. | Name: Sunil Kumar Bansal Company Secretary and Compliance Officer Telephone Number: +91 120 4770770 Email: compliance.officer@paytm.com |
| 13 | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). | Standalone basis |

Products/services

14. Details of business activities (accounting for 90% of the turnover):

| S. No. | Description of Main Activity | Description of Business Activity | % of Turnover of the entity |
|--------|--------------------------------|--|-----------------------------|
| 1 | Payment and financial services | Payment services for consumers and merchants, which enables them to send and receive payments both online and in-store. Financial Services include digital distribution of credit, insurance, and wealth management for consumers and merchants. | 80% |
| 2 | Commerce and cloud services | Commerce and Cloud services include ticketing for travel and entertainment. It also includes advertising, and loyalty programs for merchants. | 20% |

Note: In addition, we have other non-operating income

15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

| S. No. | Product/Service | NIC Code | % of total Turnover contributed |
|--------|---|----------|---------------------------------|
| 1 | Key services offered by the Company include recharge and bill payment on the Paytm app; payment gateway services; and EDC (Electronic Data Capture) payment devices | 63999 | 100 |

III Operations

16. Number of locations where plants and/or operations/offices of the entity are situated:

| Location | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National | 0 | 56 | 56 |
| International | 0 | 17 | 17 |

Note: International locations represent the number of registered offices, of the subsidiaries (including wholly owned) of the listed entity.

17. Market served by the entity.

a. Number of Locations

| Locations | Number |
|----------------------------------|---|
| National (No. of States) | The Company provides services in all states of India. |
| International (No. of Countries) | 20 |

Note: International locations represent the number of countries with recorded revenue from an export service provided for the fiscal year 2022-23, either by the listed entity, or by its subsidiaries (including wholly owned).

b. What is the contribution of exports as a percentage of the total turnover of the entity?

Approximately 1%.

c. A brief on types of customers

The Company offers payments, commerce and cloud, and financial services/solutions to over 9.2 crores transacting users every month who benefit from our aforesaid diverse range of services. These services are available on a pan India basis to individuals spanning across various age groups.

The offerings by the Company cater to a wide spectrum of customer requirements, facilitating seamless money transfers, merchant payments, bill payments, e-commerce transactions including on-line payments, and access to a variety of other financial services.

Our merchant network has grown significantly, reaching 3.56 crores (35.6 million) merchants. Large and medium-sized merchants leverage features like payment gateway, POS machines and loyalty programs to enhance overall customer experience. Simultaneously, the Company actively empowers millions of small merchants by offering payment acceptance via products such as Paytm QR and Soundbox.

IV Employees

18. Details as at the end of Financial Year: 2023

a. Employees and workers (including differently abled):

| S. No. | Particulars | Total (A) | Male | | Female | |
|------------------|---------------------------|-----------|---------|---------|---------|---------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Employees | | | | | | |
| 1 | Permanent (D)* | 25,959 | 24,310 | 93.65% | 1,649 | 6.35% |
| 2 | Other than Permanent (E)^ | NIL | NIL | NIL | NIL | NIL |
| 3 | Total Employees (D+E) | 25,959 | 24,310 | 93.65% | 1,649 | 6.35% |
| Workers | | | | | | |
| 4 | Permanent (F) | NIL | NIL | NIL | NIL | NIL |
| 5 | Other than Permanent (G) | NIL | NIL | NIL | NIL | NIL |
| 6 | Total workers (F +G) | NIL | NIL | NIL | NIL | NIL |

*Permanent Employees include Full Time Managerial Grade (MG) and Sales Grade (SG) employees

^As our PSA Consultants (CG) are not on Company payrolls and paid out as Business Consulting payout. Hence, they have not been included.

Definition according to SEBI Guideline on BRSR Page 3: (https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure2_p.PDF)

b. Differently abled Employees and workers:

| S. No. | Particulars | Total (A) | Male | | Female | |
|------------------------------------|---|-----------|---------|---------|---------|---------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Differently Abled Employees | | | | | | |
| 1 | Permanent (D) | 10 | 10 | 100% | 0 | 0 |
| 2 | Other than Permanent (E) | 0 | 0 | 0 | 0 | 0 |
| 3 | Total differently abled employees (D + E) | 10 | 10 | 100% | 0 | 0 |
| Differently Abled Workers | | | | | | |
| 4 | Permanent (F) | NIL | NIL | NIL | NIL | NIL |
| 5 | Other than Permanent (G) | NIL | NIL | NIL | NIL | NIL |
| 6 | Total differently abled workers (F + G) | NIL | NIL | NIL | NIL | NIL |

Note: Above data includes those who have declared themselves as disabled and have submitted their disability certificates as proof

19. Participation/Inclusion/Representation of women

| S. No. | Total (A) | No. and percentage of Females | |
|---------------------------------------|-----------|-------------------------------|---------|
| | | No. (B) | % (B/A) |
| Board of Directors* | 7 | 1 | 14.29% |
| Key Management Personnel [^] | 2# | 0 | 0 |

* Board of Directors - Vijay Shekhar Sharma, Ravi Chandra Adusumali, Neeraj Arora, Madhur Deora, Ashit Ranjit Lilani, Pallavi Shardul Shroff and Gopalasamudram S Sundararajan

[^]Key Management Personnel - Vijay Shekhar Sharma, Madhur Deora

#Mr. Amit Khera was a KMP (Company Secretary and Compliance Officer) who left the Company in mid of March 2023

20. Turnover rate for permanent employees and workers

| | FY 22-23 (Turnover rate in current FY) | | | FY 21-22 (Turnover rate in previous FY) | | | FY 20-21 (Turnover rate in the year prior to the previous FY) | | |
|---------------------|---|--------|--------|--|--------|--------|--|--------|--------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent Employees | 67.70% | 35.34% | 64.59% | 35.84% | 46.55% | 37.46% | 35.82% | 26.91% | 34.33% |
| Permanent Workers | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

Note: Turnover rate for Permanent Employees includes Confirmed MG +SG employees (Entity transfers from the Company to other entities are not included in attrition). MG & SG employees on probation are not included since they are yet to be confirmed.

V. Holding, Subsidiary and Associate Companies (including joint ventures)

21. (a) Names of holding / subsidiary / associate companies / joint ventures

| S. No | Name of the holding/ subsidiary/ associate companies/ joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)* |
|-------|---|--|-----------------------------------|---|
| 1. | One 97 Communications India Limited | Subsidiary | 100.00% | No |
| 2. | Paytm Entertainment Limited | Subsidiary | 100.00% | No |
| 3. | Paytm Money Limited | Subsidiary | 100.00% | No |
| 4. | Paytm Financial Services Limited | Associate | 48.78% | No |
| 5. | Admirable Software Limited ¹ | Associate | 48.78% | No |
| 6. | Paytm Payments Services Limited | Subsidiary | 100.00% | No |
| 7. | Wasteland Entertainment Private Limited | Subsidiary | 100.00% | No |
| 8. | Orbgen Technologies Private Limited | Subsidiary | 100.00% | No |
| 9. | Paytm Services Private Limited | Subsidiary | 100.00% | No |
| 10. | Paytm Insurance Broking Private Limited | Subsidiary | 100.00% | No |
| 11. | Foster Payment Networks Private Limited ² | Associate | 48.80% | No |
| 12. | Little Internet Private Limited | Subsidiary | 62.53% | No |
| 13. | Nearbuy India Private Limited ³ | Subsidiary | 62.53% | No |
| 14. | Urja Money Private Limited ⁴ | Subsidiary | 83.34% | No |
| 15. | Fincollect Services Private Limited ⁵ | Subsidiary | 83.34% | No |
| 16. | Mobiquest Mobile Technologies Private Limited ⁶ | Subsidiary | 66.34% | No |
| 17. | Xceed IT Solutions Private Limited ⁷ | Subsidiary | 66.34% | No |
| 18. | Paytm First Games Private Limited (Name changed to First Games Technology Private Limited w.e.f. April 20, 2023) ⁸ | Joint Venture | 55% | No |
| 19. | Paytm Payments Bank Limited ⁹ | Associate | 49.00% | No |
| 20. | Paytm Life Insurance Limited | Associate | 49.00% | No |
| 21. | Paytm General Insurance Limited | Associate | 49.00% | No |
| 22. | Paytm Insuretech Private Limited (formerly known as QoRQL Private Limited) | Associate | 32.45% | No |
| 23. | One97 Communications FZ-LLC | Subsidiary | 100.00% | No |
| 24. | One97 Communications Nigeria Limited | Subsidiary | 100.00% | No |
| 25. | One97 Communications Singapore Private Limited ¹⁰ | Subsidiary | 100.00% | No |
| 26. | One97 USA Inc. | Subsidiary | 100.00% | No |
| 27. | One97 Communications Tanzania Private Limited ¹¹ | Subsidiary | 100.00% | No |
| 28. | One97 Communications Rwanda Private Limited ¹¹ | Subsidiary | 100.00% | No |
| 29. | One 97 Communications Bangladesh Private Limited ¹¹ | Subsidiary | 70.00% | No |
| 30. | One97 Uganda Limited ¹¹ | Subsidiary | 100.00% | No |
| 31. | One 97 Communications Malaysia Sdn. Bhd. ¹¹ | Subsidiary | 100.00% | No |
| 32. | One 97 Benin SA ¹¹ | Subsidiary | 100.00% | No |
| 33. | One 97 Ivory Coast SA ¹¹ | Subsidiary | 100.00% | No |

| S. No | Name of the holding/ subsidiary/ associate companies/ joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)* |
|-------|--|--|-----------------------------------|---|
| 34. | Paytm Labs Inc. ¹¹ | Subsidiary | 100.00% | No |
| 35. | One Nine Seven Communication Nepal Private Limited ¹¹ | Subsidiary | 100.00% | No |
| 36. | One Nine Seven Digital Solutions Limited ¹¹ | Subsidiary | 100.00% | No |
| 37. | One Nine Seven Communications Saudi Arabia For Communication and Information Technology ¹¹ | Subsidiary | 100.00% | No |
| 38. | First Games Singapore Pte Ltd. (Formerly Paytm First Games Singapore Pte. Ltd.) | Joint Venture | 55% | No |
| 39. | Paytm Technology Beijing Co. Ltd. (Name changed to Bluefield Technology Beijing Co. Ltd. w.e.f. July 06, 2023) ¹² | Joint Venture | 55% | No |
| 40. | Socomo Technologies Private Limited | Associate | 12.75% | No |
| 41. | Infinity Transoft Solution Private Limited ¹³ | Associate | 26.57% | No |
| 42. | Eatgood Technologies Private Limited ¹³ | Associate | 23.24% | No |

¹ WOS of Paytm Financial Services Limited

² Including 4.90% held through Paytm Payments Bank Limited

³ WOS of Little Internet Private Limited

⁴ Including 15.87% held through Admirable Software Limited

⁵ WOS of Urja Money Private Limited

⁶ Including 0.63% held through Admirable Software Limited. The entities have issued preference shares as well to the Holding Company

⁷ WOS of Mobiquest Mobile Technologies Private Limited

⁸ Joint Venture of Paytm Entertainment Limited

⁹ Including 10% held through One 97 Communications India Limited. As per Banking Regulation Act, 1949, voting rights in a banking Company are capped at 26% in case the investor holds more than 26% in the bank

¹⁰ Including 43.75% held through One 97 Communications India Limited

¹¹ Subsidiary of One97 Communications Singapore Private Limited

¹² WOS of First Games Technology Private Limited

¹³ The entities have issued preference shares as well to the Holding Company

¹⁴ Please refer to details on Corporate Social Responsibility as covered in the Board's Report.

¹⁵ However, the average net profit of the Company made during three (3) immediately preceding financial years is negative and hence, the Company is not statutorily required to spend any amount on CSR activities for the financial year 2022-23

Note: Some of the subsidiary/associate companies have their own business responsibility initiatives and participate in those of the Company's only as and when required/agreed.

VI CSR Details¹⁴

22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) – Yes¹⁵

(ii) Turnover (in Rs.) Rs. 6,028 Crores

(iii) Net worth (in Rs.) Rs. 12,287 Crores

VII Transparency and Disclosures Compliances

23. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in (Yes/No) (If Yes, then provide web-link for grievance redress policy) | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|---|--|--|--|---------|--|--|---|
| | | Number of Complaints Filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of Complaints Filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Investors (other than shareholders) | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Shareholders | Yes. It is publicly available. https://ir.paytm.com/policies-and-guidelines | 17 | NIL | NIL | 40 | 2 | The 2 complaints pending at the end of the FY 2021-22 were redressed within due timelines in compliance with SEBI Listing Regulations and in accordance with Investor Grievance Policy of the Company |
| Employees & workers | Yes. It is publicly available. https://paytm.com/document/ir/policies-and-guidelines/Anti-Bribery-Anti-Corruption-Policy-Ver1.2.pdf https://paytm.com/document/ir/policies-and-guidelines/Whistle-Blower-Vigil-mechanism-policy.pdf | 27 | 5 | Nil | 18 | 0 | Nil |

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in (Yes/No) (If Yes, then provide web-link for grievance redress policy) | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|---|--|--|--|--|--|--|-------------------|
| | | Number of Complaints Filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of Complaints Filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Customers ¹⁶ | Yes https://paytm.com/company/terms-and-conditions?company=one97&tab=terms | 9,847 | 0 | a) 2,395-Merchant Helpdesk b) 7,452 - Customer Helpdesk | 1,739 | 0 | Merchant Helpdesk |
| Value Chain Partners* | No* | NA | NA | NA | NA | NA | NA |
| Others (please specify) | | | | NIL | | | |

¹⁶ The data for FY 21-22 consists of only merchant complaints. However, the data for FY 22-23 consist of merchants and users' complaints. Hence, there is a difference in the number of complaints. Further, the complaints mentioned herein are received through following channels: RBI complaints, Banking Ombudsman (BO), Nodal, Grievance (GRO)

*As of now the value chain partners register their complaints through the following email - vendorhelpdesk@paytm.com, procuresupport@paytm.com

Note: Purchase team is in a process to develop a ticketing module which is an online tool to track the real time grievances. The process is in the testing phase and the system will be ready in the next 2-3 months.

24. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale

for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format:

| S. No. | Material issues identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunities (indicate positive or negative implications) |
|--------|--------------------------------|--|--|--|--|
| 1 | Business Ethics & transparency | Opportunity | Embracing strong business ethics and transparency can offer fintech companies a notable edge in the prevailing competitive landscape. With steadfast dedication to ethical conduct, transparent practices, and safeguarding consumers, the Company continues to strengthen trust with regulators, partners, and customers. Additionally, upholding ethical principles creates a work environment that attracts and retains top tier talent seeking to contribute to an organisation esteemed for its unwavering integrity and responsible practice. | Not applicable | Positive |
| 2 | Customer satisfaction | Opportunity | The Company has established its reputation and brand and enjoys stakeholders' confidence. We are committed to delivering high levels of customer-experience and satisfaction to our user base, and have put in place requisite frameworks and measures to gauge customer satisfaction across key journeys, touch points and business lines. We have a dedicated grievance redressal mechanism for our customers and we plan to continue improving the mechanism by providing customers with multiple channels to raise their grievances, such as a dedicated helpline, email support, and an in-app chat feature. Keeping customers informed about the progress of their complaints is essential in building trust. We are working on setting realistic timeframes for resolution of issues. | Not applicable | Positive |

| S. No. | Material issues identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunities (indicate positive or negative implications) |
|--------|--|--|--|--|--|
| 3 | Data privacy | Opportunity | The Company embraces data protection and privacy as the foundation of the business operations. In this digital age, we recognize the utmost importance of safeguarding sensitive information, especially with the widespread adoption of remote working conditions, which has further amplified the significance of these measures. | Not applicable | Positive |
| 4 | Financial inclusion & product innovation | Opportunity | Addressing financial inclusion can be an opportunity for fintech companies to demonstrate their commitment to social responsibility, build trust with customers, and tap into underserved markets, thereby expanding their customer base and potential for growth. Developing solutions that address societal challenges such as financial inclusion, accessibility and sustainability can lead to positive brand perception, increased customer loyalty, and new market opportunities. By proactively integrating social responsibility into the innovation processes, we can create a positive impact on society while driving our own success in the market. The Company is committed to enhancing customer satisfaction via product innovation, efficient processes, digital solutions, easy access to products and services and fair marketing practices. | Not applicable | Positive |
| 5 | Employee wellness and talent management | Opportunity | We recognize that building a positive work culture and prioritizing employee engagement are vital components for achieving long-term success. Our commitment to effective talent management practices allows us to identify high-potential individuals and nurture their skills to prepare them for leadership roles as our Company continues to expand and flourish. | Not applicable | Positive |

| S. No. | Material issues identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying risk/ opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunities (indicate positive or negative implications) |
|--------|--|--|--|--|--|
| 6 | Community Development | Opportunity | <p>The Company, as a responsible corporate business, embraces an unwavering commitment to Corporate Social Responsibility (CSR), aimed at enhancing the quality of life for individuals within the communities it serves. Our CSR Policy stands as a testament to our dedication in creating a positive impact on society's well-being. By actively engaging with the communities in which we operate, the Company strives to be a catalyst for positive change, fostering sustainable development and empowering those in need.</p> <p>(Currently, CSR activities are being carried out through Paytm Foundation, a trust set up by the Company.)</p> | Not applicable | Positive |
| 7 | Environment sensitivity/ sustainable awareness | Opportunity | <p>While our energy consumption is modest, we are committed to minimizing it further, cutting carbon footprints, and lowering costs. By efficiently managing energy, we are reducing emissions and expenses. Our dedication to combat climate change has driven us to adopt eco-friendly solutions like VRV/VRF AC systems and LED bulbs, reducing carbon output. As environmental awareness grows, we are meeting consumer demands for sustainability. We have implemented a robust waste collection plan aligned with the Central Pollution Control Board's (CPCB) Extended Producer Responsibility. Additionally, Company has significantly curbed paper usage across its operations, contributing to our eco-conscious approach.</p> | Not applicable | Positive |

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

| Principle | Applicable Policies with Link |
|---|--|
| <p>Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability</p> | <p>Code of Conduct</p> <p>Code of Conduct for Board of Directors and the Senior Management Team</p> <p>Whistle Blower Policy/Vigil Mechanism</p> <p>Anti-Bribery & Anti-corruption Policy</p> <p>Policy on Related-Party Transaction</p> <p>Anti-Money Laundering</p> <p>Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives</p> <p>Code of practices and procedures for fair disclosure of unpublished price sensitive information</p> <p>Risk Assessment and Management Policy</p> <p>Policy on familiarization of Independent Director</p> <p>Policy on material events and information</p> |
| <p>Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle</p> | <p>Sustainable Sourcing Policy</p> |
| <p>Principle 3: Businesses should promote the wellbeing of all employees</p> | <p>Policy on Prevention of Sexual Harassment</p> <p>Whistle Blower Policy/Vigil Mechanism</p> <p>Employee Grievance Redressal Policy</p> <p>Insurance Policies</p> <p>Disciplinary Action Policy</p> <p>Nomination and Remuneration Policy</p> |
| <p>Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized</p> | <p>Web Archival Policy</p> <p>Corporate Social Responsibility Policy</p> <p>Policy for preservation of documents</p> |

| Principle | Applicable Policies with Link |
|--|---|
| Principle 5: Businesses should respect and promote human rights | Policy on Prevention of Sexual Harassment |
| | Equal Employment Opportunity Policy for Persons with Disabilities |
| | Code of Conduct (Internal) |
| | Nomination and Remuneration Policy |
| Principle 6: Business should respect, protect, and make efforts to restore the environment | Sustainability Policy |
| Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a responsible manner | Policy for Determining Material Subsidiaries |
| | Code of practices and procedures for fair disclosure of unpublished price sensitive information |
| Principle 8: Businesses should support inclusive growth and equitable development | Corporate Social Responsibility Policy |
| | Learning and Development |
| Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner | Acceptable Usage Policy |
| | Information Security Policy |

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|-----|-----|-----|-----|-----|-----|-----|-----|---------------------|
| Policy and management processes | | | | | | | | | |
| 1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs(Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| b. Has the policy been approved by the Board? (Yes/No) | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| c. Web Link of the Policies, if available | Yes | No | Yes | Yes | Yes | No | Yes | Yes | No |
| 2. Whether the entity has translated the policy into procedures. (Yes / No) | Yes | No | Yes | Yes | Yes | No | Yes | Yes | Yes |
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No) | No | No | No | No | No | No | No | No | No |
| 4. Name of the national and international codes/certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | Yes ISO 27001 |

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|----------------------------------|----|---|----|---|----|----|---|----|
| 5. Specific commitments, goals and targets set by the entity with defined timelines | No | No | Yes. 1. Conducting safety training for value chain partners by FY ending March 2024. 2. Ensuring human rights training for employees by FY ending March 2024 3. Through continuous learning and professional growth opportunities, we aim to empower our workforce, enhancing their capabilities, and fostering a thriving and dynamic work environment. | No | Yes 1. Conducting safety training for value chain partners by FY ending March 2024. 2. Ensuring human rights training for employees by FY ending March 2024 | No | No | Yes. To create a positive and lasting impact in the lives of communities. To achieve this, we will identify key focus areas and actively work towards uplifting these communities through our initiatives and efforts. | No |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met | No commitment was made last year | | | | | | | | |

Governance, leadership, and oversight

7. Statement by director responsible for the business responsibility & sustainability report highlighting ESG related challenges, targets and achievements

We are delighted to present the Company's Business Responsibility and Sustainability Report for the year, which details our achievements and commitment towards promoting environmental, social, and governance (ESG) principles. We are India's leading mobile payments and financial services distribution company, and the pioneer of the mobile QR payments revolution in India. The Company's mission is to serve half a billion Indians and bring them to mainstream of economy with help of technology.

As a prominent digital financial services platform, we are dedicated towards working with relevant stakeholders to establish a robust ESG framework that aligns with our mission of creating sustainable value. We have consistently invested in technology and built a strong digital infrastructure, as outlined in the report. OCL builds technologies that help small businesses with payments and commerce, and we take great pride in extending financial services to underserved communities and promoting financial literacy in India. Through our various collaborations, we have provided access to affordable and convenient digital financial services.

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|--|----|----|----|----|----|----|----|----|
| <p>We are equally committed to fostering a diverse and inclusive workplace that promotes equal opportunities and have implemented concrete measures to enhance diversity across all levels of our organization. In conclusion, our commitment to ESG principles is fundamental to our long-term success and sustainability as a business. We will continue to prioritize these issues to achieve our goals and advance our vision of a more responsible and inclusive future.</p> | | | | | | | | | |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies) | <p>CSR Committee comprises of:</p> <ul style="list-style-type: none"> > Mr. Vijay Shekhar Sharma > Mr. Ravi Chandra Adusumalli > Mr. Gopalamudram S Sundararajan | | | | | | | | |
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision-making on sustainability related issues? (Yes / No). If yes, provide details | <p>CSR committee shall be responsible for decision making and has approved the formulation of an ESG Committee to implement/ monitor its execution.</p> | | | | | | | | |

10. Details of Review of NGRBCs by the Company:

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | | | | | | | | | Frequency: Annually (A) / Half yearly (H) / Quarterly (Q) / Any other – please specify | | | | | | | | |
|---|--|----|----|----|----|----|----|----|----|--|----|----|----|----|----|----|----|----|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies & follow up action | No | | | | | | | | | NIL | | | | | | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances | Yes | | | | | | | | | Half yearly | | | | | | | | |

| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|--|----|----|----|----|----|----|----|----|
| 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/ No). If yes, provide name of the agency. | No independent assessment has been carried out | | | | | | | | |

12. If answer to question (1) above is “No” i.e., not all Principles are covered by a policy, reasons to be stated:

| Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|-------------------------------------|----|----|----|----|----|----|----|----|
| The entity does not consider the Principles material to its business (Yes/No) | NA since question (1) above is Yes. | | | | | | | | |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | | | | | | | | | |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | | | | | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | |

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

PRINCIPLE 1 Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

| Segment | Total number of training and awareness programmes held | Topics / principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|--------------------------------|--|---|---|
| Board of Directors (BoD) | 1 | 1. Cyber Security Awareness 2. Overview of Data Privacy Bill | 100% |
| Key Managerial Personnel (KMP) | 2* | 1. Cyber security training on LMS (Learning Management System) 2. POSH (Prevention of Sexual Harassment) on LMS. The impact of these sessions was focused on building safe work environment and Company risk mitigation | The sessions were assigned to all 3 KMPs. Completion rate as below: 1. Cybersecurity digital module- 100% 2. POSH- 100% |

| Segment | Total number of training and awareness programmes held | Topics / principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|---|---|
| Employees other than BoD and KMPs | 41 Trainings (Unique count) | <ol style="list-style-type: none"> 1. COC – (Company’s code of conduct) 2. Anti Money Laundering (AML) for designated employees (Compliance team) 3. Insider trading awareness 4. POSH Trainings <p>Career Aiding Skills for growth & development like:</p> <ol style="list-style-type: none"> 1. Tech Upskilling - Cloud related skilling AWS & Tech Talks for knowledge sharing 2. Product Upskilling - Product related skilling & knowledge sharing for Product Managers 3. Behavioural Upskilling – Learning Hour for everyday soft skills, Customer Service, Team Leading, Campus to Corporate Program, Interviewing effectiveness etc. 4. Tool related skilling on topics like Excel, Python, SQL, etc. | <ul style="list-style-type: none"> • COC -Company’s Code of conduct 82.76% • Anti-money Laundering (AML) for designated employees (Compliance team) - 100% • Insider trading awareness for targeted employees -100% • POSH Training - 70% • Career Aiding Skills for growth & development - 49% collectively |
| Workers | | NIL | |

*Trainings were conducted for all the 3 KMPs but Amit Khara left the organization in mid-March 2023. However, he had completed the trainings assigned to him.

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity’s website):

| | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Amount (In ₹) | Brief of the Case | Has an appeal been preferred? (Yes/No) |
|-----------------|-----------------|---|---------------|-------------------|--|
| Monetary | | | | | |
| Penalty/ Fine | P1-P9 | NA | NIL | NA | NA |
| Settlement | P1-P9 | NA | NIL | NA | NA |
| Compounding fee | P1-P9 | NA | NIL | NA | NA |

| | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |
|---------------------|-----------------|---|-------------------|--|
| Non-Monetary | | | | |
| Imprisonment | P1-P9 | NIL | No Case | NA |
| Punishment | P1-P9 | NIL | No Case | NA |

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

| Case Details | Name of the regulatory/enforcement agency/ judicial intuitions |
|--------------|--|
| NIL | NA |

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web link to the policy.

Yes, we have an Anti-Bribery and Anti-Corruption Policy. The Company is committed to maintaining highest level of professional and ethical standards in the conduct of its business. The Company has a zero tolerance towards bribery and corruption in any form, whether directly or indirectly through a third party. Further, the Company is committed to upholding all such laws and regulations, as may be applicable, in every jurisdiction where it has its operations.

Web Link - <https://paytm.com/document/ir/policies-and-guidelines/Anti-Bribery-Anti-Corruption-Policy-Ver1.2.pdf>

5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

| | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year |
|-----------|---------------------------------------|--|
| Directors | NIL | NIL |
| KMPs | NIL | NIL |
| Employees | NIL | NIL |
| Workers | NIL | NIL |

6. Details of complaints with regard to conflict of interest:

| Particulars | FY 22-23 Current Financial Year | | FY 21-22 Previous Financial Year | |
|--|------------------------------------|---------|-------------------------------------|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | NIL | NIL | NIL | NIL |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | NIL | NIL | NIL | NIL |

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions on cases of corruption and conflicts of interest.

NIL

Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

| | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year | Details of Improvements in Environmental and social impacts |
|-----------|---------------------------------------|--|---|
| R&D (₹) | 90% | 68% | Reduced paper usage, transitioning to software solutions and enhancing data management through adoption of Electronic Data Capture (EDC) devices, softwares capitalised, sandbox etc. |
| CAPEX (₹) | 4% | 0% | Promoting sustainable growth of digital payments and enabling affordable access to financial services through additions to Project infinity – PG system developed in-house. |

2 a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes. As a responsible corporation, the Company strives to reduce the environmental impacts of its operations. We aim at sourcing the most energy efficient and sustainable products (such as ensuring that all our electrical appliances are 5-star rated for energy efficiency) and services available in the market from known and reputed vendor.

b. If yes, what percentage of inputs were sourced sustainably?

Currently, it is not being tracked

3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Given the nature of its business, the Company has limited scope to use recycled material as processed inputs. All waste that is generated on our premises is disposed-off to Government authorized agencies who have sorting/processing units of their own.

The Company has a process to dispose-off E - waste assets. We also strictly follow our E-Waste Policy for e-waste generated through our business activities. We dispose-off our e-waste through CPCB listed e-waste vendors.

<https://business.paytm.com/ewaste-compliance-tnc>

4 Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Yes, EPR E-waste, Plastic Waste and Battery Waste Management Rules are applicable to the Company, and the waste collection plan is in line with the EPR plan submitted to CPCB.

PRINCIPLE 3 Businesses should respect and promote the well-being of all employees, including those in their value chain.

Essential Indicators

1. a. Details of measures for the well-being of employees:

| Category | % of employees covered by | | | | | | | | | | | | |
|--|---------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|------------|-----------------------|------------|---------------------|------------|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity Benefits | | Paternity Benefits | | Day Care Facilities * | | Term Life Insurance | |
| | | Number (B) | % (B/A) | Number (C) | % (C/A) | Number (D) | % (D/A) | Number (E) | % (E/A) | Number (F) | % (F/A) | Number (G) | % (G/A) |
| Permanent employees ¹⁷ | | | | | | | | | | | | | |
| Male | 24,310 | 24,310 | 100% | 24,310 | 100% | NA | NA | 24,310 | 100% | NA | NA | 24,310 | 100% |
| Female | 1,649 | 1,649 | 100% | 1,649 | 100% | 1,649 | 100% | NA | NA | 1,649 | 100% | 1,649 | 100% |
| Total | 25,959 | 25,959 | 100% | 25,959 | 100% | 1,649 | 6.35% | 24,310 | 93.65% | 1,649 | 6.35% | 25,959 | 100% |
| Other than Permanent employees | | | | | | | | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Total | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

b. Details of measures for the well-being of workers:

| Category | % of workers covered by | | | | | | | | | | | |
|-------------------------------------|-------------------------|------------------|------------|--------------------|------------|--------------------|------------|--------------------|------------|---------------------|------------|-----|
| | Total (A) | Health Insurance | | Accident Insurance | | Maternity benefits | | Paternity Benefits | | Day Care facilities | | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (D) | % (D/A) | No. (E) | % (E/A) | No. (F) | % (F/A) | |
| Permanent workers | | | | | | | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Total | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Other than Permanent workers | | | | | | | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Total | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

¹⁷ The Child day-care facility extends an enhanced employee benefit to support our colleagues with small children so that each of us can work towards our career aspirations without compromising on childcare. Further, enhanced childcare benefit policy reflects our commitment towards enabling workforce diversity and hybrid work model.

The Day care facility is applicable for mothers. This is in compliance with the Maternity Benefit Act,1961 as well as the relevant guidelines laid out by the Government.

For Single parents of either gender, either parent for same gender couples, Parents of either gender with a child clinically diagnosed with special needs (Physical or Mental disability), these are special cases and require approval of the Head of the Department. However, no such claim has been availed yet.

The children clinically diagnosed with special needs (Physical or Mental disability) are entitled to be admitted into a day-care centre that provides care for children with special needs.

*The Company doesn't have Day-care facility on the premises. Due to a large workforce working from home mode, we have tie-ups with nationally renowned third-party day-care facility centres in various cities which has been communicated to employees and full payment is provided directly to the day-care center.

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year.

| Benefits | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|-------------------------|--|--|--|--|--|--|
| | No. of employees covered as % of total employees | No. of workers covered as % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as % of total employees | No. of workers covered as % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF | 99.89%* | NIL | Y | 99.76% | NIL | Y |
| Gratuity | 100% | NIL | NA | 100% | NIL | NA |
| ESI | 48.02%** | NIL | Y | 29.17% | NIL | Y |
| Others - please specify | NIL | | | | | |

For FY'23:

* 28 out of 25,959 Employees have not opted for PF

** 12,466 employees are covered in ESIC (32 MG & 12,434 SG)

For FY'22

* 26 out of 10,775 Employees have not opted for PF

** 3,143 employees are covered in ESIC (1 MG and 3142 SG)

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, we have wheelchairs and signages for inclusive restrooms in our major office, which are accessible to persons with physical disabilities. We also have ramps for easy access to the Company's premises.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

The Company has adopted an Equal Employment Opportunity Policy for Persons with Disabilities in order to comply with the Rights of Persons with Disabilities Act, 2016 along with the Right of Persons with Disabilities Rules, 2017 ("Act")., to empower, protect and further the interests of persons with Disabilities employed in the Company. The policy outlines the company's approach towards disabled employees.

- a. This policy describes how we are creating an inclusive workplace and work culture in which disabled employees are treated with respect and dignity.

- b. This policy is designed to create equal opportunity(ies) in all aspects of employment for disabled persons and to maintain a non-discriminatory and inclusive work environment which enables robust career advancement for people with disabilities, including those who acquire Disability during their employment tenure.
- c. This policy contains provisions to ensure that adequate facilities and amenities, as well as physical and digital infrastructure to cater to the needs of the persons with disabilities and to enable them to discharge their duties in the Company effectively.

The policy can be accessed at Equal Employment Opportunity Policy for Persons with Disabilities. <https://paytm.com/document/ir/policies-and-guidelines/Equal-opportunities-for-Employees.pdf>

5. Return to work and retention rates of permanent employees and workers that took parental leave.

| Gender | Permanent Employees* | | Permanent Workers | |
|--------|--------------------------|---------------------|--------------------------|---------------------|
| | Return to work rate in % | Retention rate in % | Return to work rate in % | Retention rate in % |
| Male | 100% | 81.21% | NIL | NIL |
| Female | 100% | 68.63% | NIL | NIL |
| Total | 100% | 78.24% | NIL | NIL |

* Above data does not include 37 employees who took parental leaves during FY 22-23 and they are due to return in the next fiscal year as their parental leave will end post 31st March 2023.

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

| Particulars | Yes/No (If yes give the details of the mechanisms in brief) |
|--------------------------------|---|
| Permanent workers | No |
| Other than permanent workers | No |
| Permanent Employees | Yes |
| Other than permanent employees | No |

The Company has a robust employee grievance redressal mechanism which is managed through the Consequence Management Policy. It provides an easy and readily accessible redressal platform to the employees for prompt redressal of their grievances. The Company does not tolerate any direct or indirect retaliation against employees who raise grievances and will take necessary actions in case anyone is found to have engaged in any such retaliation. The employees and workers who face any kind of discontent or dissatisfaction owing to work or culture related issues, team related issues, or any other issue can report the same to the reporting manager/Skip manager/HR Business

Partner/ HOD (head of the department) or CHRO (Chief Human Resources Officer) according to the defined stages for redressal in the policy. We also provide specific helpdesk IDs for queries related to PF (Provident Fund), payroll etc.

In addition, the Anti Bribery and Whistle-Blower mechanism provides a formal platform to share grievances on various matters. The Compliance Officer ensures the mandatory training of internal stakeholders once a year to enhance their compliance with our policies. The details of the grievance mechanism are shared with employees through a specific module. They can raise their concerns pertaining to bribery or corruption using our vigil mechanism. We have appointed Navex Global to facilitate reporting in a protected manner which will keep the identity of complainants confidential.

The Company has a POSH Policy and has an Internal Complaints Committee (ICC) in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Our policy on the same is placed on the Company's website. The ICC comprises a majority of women members. Members of the ICC are responsible for conducting inquiries pertaining to such complaints. On a regular basis, we sensitise our employees on the prevention of sexual harassment at the workplace through workshops, group meetings, online training modules and awareness programmes.

Link for POSH Policy- <https://paytm.com/document/ir/policies-and-guidelines/Prevention-of-Sexual-Harassment-at-Workplace-Policy.pdf>

Link for Whistle-blower Policy- <https://paytm.com/document/ir/policies-and-guidelines/Whistle-Blower-Vigil-mechanism-policy.pdf>

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:

| Category | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|----------------------------------|--|--|---------|--|--|---------|
| | Total employees/workers in respective category (A) | No. of employees/workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees/workers in respective category (C) | No. of employees/workers in respective category, who are part of association(s) or Union (D) | % (D/C) |
| Total Permanent Employees | | | | | | |
| Male | 24,310 | NIL | NIL | 9,475 | NIL | NIL |
| Female | 1,649 | NIL | NIL | 1,300 | NIL | NIL |
| Total Permanent Workers | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL |

8. Details of training given to employees and workers:

| Category | FY 22-23 Current Financial Year | | | | | FY 21-22 Previous Financial Year | | | | |
|------------------|------------------------------------|-----------------------------------|------------|-------------------------|------------|-------------------------------------|-----------------------------------|------------|-------------------------|------------|
| | Total (A) | On Health & Safety Measures | | On Skill Upgradation | | Total (D) | On Health & Safety Measures | | On Skill Upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Employees | | | | | | | | | | |
| Male | 24,310 | 804 | 3.3% | 11,754 | 48.4% | 9,475 | 1023 | 10.8% | 6019 | 63.5% |
| Female | 1,649 | 296 | 17.9% | 968 | 58.7% | 1,300 | 140 | 10.7% | 821 | 63.2% |
| Total | 25,959 | 1,100 | 4.2% | 12,722 | 49.0% | 10,775 | 1163 | 10.8% | 6840 | 63.5% |
| Workers | | | | | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Total | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

9. Details of performance and career development reviews of employees and worker:

| Category | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|------------------|------------------------------------|---------|---------|-------------------------------------|---------|---------|
| | Total (A) | No. (B) | % (B/A) | Total (C) | No. (D) | % (D/C) |
| Employees | | | | | | |
| Male | 24,310 | 22,308 | 91.8% | 9,475 | 7,040 | 74.3% |
| Female | 1,649 | 1,316 | 79.8% | 1,300 | 813 | 62.5% |
| Total | 25,959 | 23,624 | 91.0% | 10,775 | 7,853 | 72.8% |
| Workers | | | | | | |
| Male | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL |
| Total | NIL | NIL | NIL | NIL | NIL | NIL |

Note: The employees who have joined on or before 30th Sept 2022 are the eligible employees for the annual performance review for FY'22-23

Front line sales are provided real time performance review on a monthly basis and are part of the career progression plan which enables them for a real time review and progression during the year.

10. Health and safety management system:

| | |
|---|---|
| <p>a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage such system?</p> | <p>Yes.</p> <p>There are minimal occupational health and safety risks considering our nature of the business.</p> <p>While the Company is currently developing an exclusive OHS (Occupational Health and Safety) Policy and framework, employee well-being and safety continue to be a priority for the Company. The following Health and Safety management system have been implemented-:</p> <ul style="list-style-type: none"> a) The Company has ensured physical and electronic security including man-guarding, installation of Access Control Systems, CCTV monitoring, and fire-fighting systems at all our offices. b) The admin team conducts emergency/disaster management drills, including fire-fighting drills at regular intervals in all offices. The buildings are in line with the National Building Code. c) Offices are ergonomically designed with ergonomic modular furniture for the comfort of employees. d) Central heating, ventilation, and cooling system with air filters are installed in the offices and there is a provision of fresh air in all our offices through the installation of air purifiers. Air purifying plants have been placed in all our offices that help in cleaning the indoor air. e) Centralized helpline number for employees to reach out to the administration department for any work-related hazards. f) The Company has tied up with nearby hospitals for emergency medical support. g) Safe drinking water, hygienic and clean offices, and food safety are provided across all our offices. |
|---|---|

| | |
|---|---|
| | <p>h) The Company's admin team ensures periodic checks, maintenance, and certification of all electromechanical equipment including Lifts, HVAC (heat, ventilation and air conditioning), fire systems, DG (Diesel Generator) sets, UPS (Uninterruptible Power Supply).</p> <p>i) For emergency support, oxygen concentrators, masks, and PPE (Personal Protective Equipment) kits were provisioned at all offices during Covid-19.</p> |
| <p>b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?</p> | <p>To minimize the risks, the following checks are undertaken by the Company:</p> <ul style="list-style-type: none"> • Security Checks (Physical security including man-guarding, Access Control System, CCTV monitoring, Fire-fighting systems) • Disaster Management Plan is in place and the Company conducts fire drill exercise annually. • Water testing to measure Total Dissolved Solid (TDS) • Heating Ventilation Air Conditioning (HVAC) checks at regular intervals. • Building safety, periodic maintenance of electromechanical devices like lifts, UPS, Diesel Generators • Maintain office hygiene and cleanliness. • Necessary precautions, such as installation of thermal scanners, office sanitization, and social distancing, were undertaken as per govt. guidelines to prevent the risks associated with the COVID-19 pandemic. • Hybrid Office System/Work from Home Policy was introduced. • Security guards deployed at the bank premises are trained on fire safety equipment. • Regular advisories are issued on various safety-related aspects, such as weather warnings, fire safety and security, etc. |

| | |
|---|---|
| <p>c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)</p> | <p>Yes, the centralized Helpline number and email is provided to all the employees to report any kind of risks. Our Quick Response Teams are deployed at all major offices for immediate support. The HR and Admin teams regularly organise sessions on health and safety awareness which are conducted by experts on different subject matters for all employees. Regular communication/mailers related to health and safety are also sent to all employees.</p> <p>Mental health wellness sessions were organized for the employees in collaboration with doctors from prominent hospitals. We have tied up with various hospitals for employee discounts on medical tests and treatment.</p> <p>During COVID-19 pandemic, various initiatives were taken by the Company, such as office sanitisation, hand sanitisation, social distancing, and mandatory face masks as per Govt. guidelines. Vaccination drives were organised at all offices for our employees and their families. The team arranged and distributed masks, sanitizers, oxygen cylinders, and concentrators to safeguard employees' health during the pandemic.</p> <p>Mental health wellness sessions were organised for the employees in collaboration with doctors from prominent hospitals.</p> <p>A total of 182 "Breast cancer sessions" and 168 sessions on "All about Headaches" were conducted.</p> |
| <p>d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)</p> | <p>Yes. Employees and workers have medical and term insurance which covers the healthcare benefits for all the employees</p> |

11. Details of safety related incidents, in the following format:

| Safety Incident/Number | Category | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year |
|--|-----------|---------------------------------------|--|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | NIL | NIL |
| | Workers | NIL | NIL |
| Total recordable work-related injuries | Employees | NIL | NIL |
| | Workers | NIL | NIL |

| Safety Incident/Number | Category | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year |
|---|-----------|---------------------------------------|--|
| No. of fatalities | Employees | 11 | 37 |
| | Workers | NIL | NIL |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | NIL | NIL |
| | Workers | NIL | NIL |

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

The following measures have been taken by the Company to ensure a safe and healthy workplace:

- Physical and electronic security measures, such as man guarding, Access Control System, CCTV monitoring and Fire-fighting systems.
- Fire and burglar alarms with fire and smoke sensors are installed for early fire detection.
- Fire extinguishers are available in all offices for immediate fire-fighting, and regular maintenance of the equipment is ensured.
- Comprehensive training and awareness about best practices and firefighting are provided to guards and employees. The Company conducts regular mock drills, fire drills, and physical verification of fire safety equipment, along with evacuation plans.
- Auto fire suppressants are installed in data/server rooms in selected offices.
- Earthing pits and lightning conductors are installed in buildings to discharge lightning safely.
- Important contact numbers for the nearest fire brigade, police station, ambulance, etc., are displayed at buildings/offices.
- Public address systems are installed at office premises to facilitate communication during emergencies.
- Emergency Evacuation plans, floor plans, and exit paths are displayed on each floor.
- CCTV cameras are used for detecting and recording all activities, including sabotage, if any.
- First-Aid Boxes are available in all offices, and regular first-aid training is provided to all employees and security guards.
- Employees' dependents are enrolled under Mediclaim to provide medical coverage.
- Free-of-cost shuttles are provided for employees to commute from the nearest metro station to the office, promoting convenience and reducing transportation risks.
- The Company ensures cleanliness and hygiene in the dining area to maintain a healthy environment.

13. Number of Complaints on the following made by employees and workers:

| | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|--------------------|------------------------------------|---------------------------------------|---------|-------------------------------------|---------------------------------------|---------|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | NIL | NA | NIL | NIL | NA | NIL |
| Health & Safety | NIL | NA | NIL | NIL | NA | NIL |

14. Assessments for the year:

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|--|
| Health and safety practices | NIL |
| Working Conditions | NIL |

Note: The Company offers world-class workplaces for its employees. These workplaces have well-appointed, safe and hygienic workspaces and ambient conditions. There were queries on COVID-related medical support which were handled and resolved by the COVID helpdesk.

SkymarkOne Noida building (which is the Company’s corporate office location) is an Indian Green Building Council Platinum certified building with indoor environmental quality more efficient than conventional designs like energy-efficient windows, LED lighting, energy-efficient appliances, geothermal heat pumps, energy-efficient insulation etc. Internal team assesses the health, safety, and environmental performance across applicable offices. Major offices are given training on fire safety and evacuation drills. Fire drills and audits are conducted in the office premises to ensure the maintenance of safety standards.

During the year, there were no accidents of any employee of the Company whilst on duty. To prevent the spread of COVID-19, during the year, the Company took necessary precautions at all its offices, which included sanitation facilities, social distancing, installation of thermal scanners and installation of air purifiers which do not use chemicals or produce ozone. Detailed standard operating procedures and guidelines/advisories were issued periodically to the employees of the Company. The Company adheres to directives issued by the government/local authorities pertaining to COVID-19.

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

During the year, there were no accidents reported whilst on duty.

Leadership Indicator

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes, we have GTL (Group term Life insurance coverage) for all the permanent employees and. Assistance for PF and Gratuity settlement is also extended to the family on the priority basis.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

| | Total no. of affected employees/ workers | | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment | |
|-----------|---|--|--|--|
| | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year |
| Employees | 11 | 37 | NIL | 1 |
| Workers | NIL | NIL | NIL | NIL |

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes. The Company provides gratuity to employees who fulfil the criteria at the time of retirement. The retiring employees also have detailed understanding of our business, processes and systems. Hence, in order to leverage such experienced people, we appoint them as an external consultant as per Company’s requirements on a case-to-case basis.

Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

The stakeholders have been identified on the basis of:

- those who are directly or indirectly related to our activities, products or services like employees or merchants;
- those for whom the Company has legal, commercial, operational, or ethical/moral responsibilities like regulatory bodies; and
- those who can influence or have impact on our decision-making like board/investors.

Stakeholders are the individuals or organizations that are internal or external to the Company and who have an interest in its operations. The favourable or adverse view of these stakeholders may have an impact on the reputation of the organization, which is why it is crucial to identify them. We believe healthy stakeholder relationships are key to long-term value creation. Anyone adding value to the business of the Company or anyone impacted by its operations are identified as a core stakeholder.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

| Stakeholder Group | Whether identified Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others | Frequency of engagement (Annually/ Half/ yearly/ Quarterly/ others - please specify) | Purpose and scope of engagement including key topics and concerns raised during engagement |
|-------------------|---|--|--|--|
| Employees | No | Emails | Weekly | <ul style="list-style-type: none"> • Learning and development • Organizational updates |
| | | Newsletter | Quarterly | <ul style="list-style-type: none"> • Employee recognition and engagement activities • Employee performance review and career development |
| Customers | No | Social Media | Weekly | To stay in touch with the customer throughout and address any issues that the customer may have |

| Stakeholder Group | Whether identified Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others | Frequency of engagement (Annually/ Half/ yearly/ Quarterly/ others - please specify) | Purpose and scope of engagement including key topics and concerns raised during engagement |
|-------------------------|---|--|--|---|
| Merchants | No | Business App | Everyday | <ul style="list-style-type: none"> Resolving queries Support on the sandbox Support on information related to business with Company's |
| Vendors/ suppliers | No | Emails | Everyday | <ul style="list-style-type: none"> Resolving queries and assessing performance. Contract negotiation and exploring new scope of work |
| Partners | No | Emails | Fortnightly | Resolving queries and operational challenges |
| Shareholders/ investors | No | Face-to-face meetings | Monthly | <ul style="list-style-type: none"> These are aimed at providing relevant information as well as understanding stakeholders' perspectives on Company's performance and strategy. To update them with the recent market development |
| Government bodies | No | Face to face meetings | Weekly | Discussions with relevant Ministries, Departments within Ministries, Sectoral Regulators, various Committees constituted by the Government on existing and proposed regulations / orders / directives and advisories undertaken on need basis. |

| Stakeholder Group | Whether identified Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Others | Frequency of engagement (Annually/ Half/ yearly/ Quarterly/ others - please specify) | Purpose and scope of engagement including key topics and concerns raised during engagement |
|-------------------|---|--|--|--|
| Media | No | Emails | Monthly | Sustained brand narrative communication through press releases, social posts and SE filings. The announcements include partnerships, product launches, business updates and more. This also includes engaging with the media in industry stories, or resolving queries with spokesperson statements. |
| Board members | No | Board Meetings | Quarterly | Company conducts a proactive and focused engagements which helps identify significant material issues for the Company, evaluate business strategy and operations, products, services and solutions, to minimize reputational risk and positively influence our internal and external environment |

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

We have established a CSR committee which has an overall responsibility for the effective operation, setting guidance, direction and overseeing policies and progress on the Company's ESG related activities and shall offer advice to the Board and management on these matters. The responsibilities of the CSR committee include the following:

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013, as amended;

- To review and recommend the amount of expenditure to be incurred on the CSR activities;
 - To monitor the corporate social responsibility policy of the Company and its implementation from time to time;
 - To monitor the Company's ESG framework, strategy, goals and disclosures;
 - To constitute an ESG sub-committee (management level committee) which will provide an oversight on key policies and programs required to implement ESG strategy as well as monitor its execution; and
 - Any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board or as may be directed by the Board from time to time and/or as may be required under applicable law, as and when amended from time to time.
- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, we consider stakeholder consultation a significant step towards identifying and managing ESG topics and have therefore conducted a materiality assessment exercise to this effect. The analysis included a finalisation of ESG issues material to our business viz. consultations with internal and external stakeholders inclusive of shareholders/investors, employees, customers, partners, vendors/suppliers and merchants on the degree of relevance of our material topics.

The material topics identified include business ethics & transparency, customer satisfaction, data privacy, financial inclusion & product innovation, employee wellness and talent management, community development and environment sensitivity/sustainable awareness.

Through this identification and prioritisation process, we aim to continue our sustainability journey.

Principle 5: Businesses should respect and promote human rights

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy (ies) of the entity:

The Company promotes a culture of fairness and inclusion. Policies and processes like POSH, Whistleblower, Grievance Redressal, Equal Employment Opportunity, Code of Conduct etc. are in place to protect human rights of employees. The Company policies are well defined and the employees are regularly educated and trained as these policies are disseminated through the electronic medium.

Every employee has been given a briefing during their onboarding for these policies. Every employee undergoes a couple of mandatory training on LMS within 30 days of joining to get a deeper understanding. The respective team tracks these trainings and ensures that they are completed within a stipulated time.

| Category | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|------------------------|------------------------------------|--------------------------------------|---------------|-------------------------------------|--------------------------------------|--------------|
| | Total (A) | No. of employees/workers covered (B) | % (B/A) | Total (C) | No. of employees/workers covered (D) | % (D/C) |
| Employees | | | | | | |
| Permanent | 25,959 | 21,484 | 82.76% | 10,755 | 7,070 | 65.6% |
| Other than Permanent | NIL | NIL | NIL | NIL | NIL | NIL |
| Total Employees | 25,959 | 21,484 | 82.76% | 10,755 | 7,070 | 65.6% |
| Workers | | | | | | |
| Permanent | NIL | NIL | NIL | NIL | NIL | NIL |
| Other than Permanent | NIL | NIL | NIL | NIL | NIL | NIL |
| Total Workers | NIL | NIL | NIL | NIL | NIL | NIL |

Note: Employees undergo COC trainings which broadly covers various aspects of human rights. The frontline salesforce team also undergoes such trainings as a refresher training by the regional SPOCs.

2. Details of minimum wages paid to employees and workers, in the following format:

| Category | FY 22-23 Current Financial Year | | | | | FY 21-22 Previous Financial Year | | | | |
|----------|------------------------------------|-----------------------------|------------|---------------------------|------------|-------------------------------------|-----------------------------|------------|---------------------------|------------|
| | Total (A) | Equal Minimum Wage to | | More than Minimum Wage | | Total (D) | Equal Minimum Wage To | | More than Minimum Wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |

Employees

Permanent

| | | | | | | | | | | |
|--------|--------|-----|-----|--------|------|-------|-----|-----|-------|------|
| Male | 24,310 | NIL | NIL | 24,310 | 100% | 9,475 | NIL | NIL | 9,475 | 100% |
| Female | 1,649 | NIL | NIL | 1,649 | 100% | 1,300 | NIL | NIL | 1,300 | 100% |

Other than Permanent

| | | | | | | | | | | |
|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

Workers

Permanent

| | | | | | | | | | | |
|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

Other than Permanent

| | | | | | | | | | | |
|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Male | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |
| Female | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |

3. Details of remuneration/salary/wages, in the following format

| Gender | Male | | Female | |
|-----------------------------------|-----------------|---|--------|---|
| | Number | Median remuneration/salary/wages of respective category | Number | Median remuneration/salary/wages of respective category |
| Board of Directors (BoD) | 4 ¹⁸ | 14.3 | 1 | 20.5 |
| Key Managerial Personnel | 2 | 31.8 | NA | NIL |
| Employees other than BoD and KMP* | 24,308 | 0.33 | 1,649 | 0.92 |
| Workers | NIL | NA | NIL | NA |

*in ₹ lacs per month

¹⁸ This doesn't include the Executive Directors who are covered in the KMPs (in below row), Mr. Mark Schwartz whose term as an Independent Director expired during the fiscal year and includes Mr. Ravi Chandra Adusumalli who doesn't draw any remuneration.

4 Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes. The internal team of the Company who owns Anti- Bribery and Anti-Corruption (ABAC) Policy manage and oversee all the concerns/complaints raised via the whistle blower mechanism. The status of the said complaints is presented in the quarterly Audit Committee/Board meetings, in compliance with ABAC and Vigil Mechanism/Whistle Blower Mechanism Policy of the Company.

The Company has zero tolerance for sexual harassment at workplace and is compliant with provisions relating to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. We have an ICC responsible to investigate and provide redressal for any kind of sexual harassment. A helpline number and a designated email ID for ICC is shared to employees to raise complaints or get counselling.

The Company also promotes a non-discriminatory work environment and abides by the equal opportunity for all policy. It also has a Consequence Management Policy where any kind of reported or suspected misconduct is corrected or investigated upon by following a disciplinary procedure setup by the disciplinary action committee. The committee is responsible for maintaining the repository of the investigations as well.

5 Describe the internal mechanisms in place to redress grievances related to human rights issues.

The organization has a Consequence Management Policy that makes the employees aware of the various corrective actions the Company might take against erring employees and the process that will follow if any misconduct is noticed/suspected/reported. The policy is available on the intranet, Deep Purple.

Our leadership fosters a culture of accessibility, providing employees with direct access to them through the HRMS platform for any grievances or concerns.

As per the whistle-blower mechanism, the Company expects all the stakeholders to comply with the mechanism and shall raise the concerns, if any, for the instances like bribery, suspicion of corruption, behavioural issues, discrimination etc via this vigil mechanism. The identity of the complainants shall remain confidential during the investigation and may be disclosed only on 'need to know' basis. The Company has enabled web portal "Navex Global" to take anonymous complaints and facilitate reporting of the protected disclosures routed through the web links, toll-free number and application access mentioned in detail on the Intranet, Deep Purple. The details of the same are also available in the ABAC Policy as available on the Company's website.

For every protected disclosure raised on the Navex portal, a unique case number allocated that can be further leveraged to provide necessary information and track the status of complaint raised by the complainant. The Company timely investigates all the complaints reported under the whistle blowing mechanism. The investigating team shall ensure compliance with all the regulatory requirements during the course of investigation. After the completion of the

investigation, a report is submitted with recommended measures to the concerned stakeholders (including the Disciplinary Action Committee) and appropriate disciplinary actions are initiated based on the findings and recommendations of such a report. The stakeholders are guided by the existing Consequence Management Policy. The policy reinforces the complainants, who raise complaints on a concrete and reasonable belief about a violation, that they will not be subjected to any kind of retaliation such as discrimination, reprisal, harassment, victimization etc. irrespective of the concern being ultimately substantiated.

6. Number of Complaints on the following made by employees and workers:

| Category | FY 22-23 Current Financial Year | | | FY 21-22 Previous Financial Year | | |
|--|------------------------------------|---|--|-------------------------------------|---|---------------------------------------|
| | Filed during the year | Pending resolution at the end of the year | Remarks | Filed during the year | Pending resolution at the end of the year | Remarks |
| Sexual Harassment | 5 | 1 | Out of the 4 disposed cases, 1 case was withdrawn by the complainant. The 1 pending complaint has been closed after March 31, 2023 | 3 | 1 | One case withdrawn by the complainant |
| Discrimination at workplace | 14 | 1 | HR team was unable to investigate as the Complainant chose to remain anonymous and did not specify any names of the accused individual(s) | 9 | 0 | NIL |
| Child Labour | NIL | NIL | NIL | NIL | NIL | NIL |
| Forced labour/ involuntary labour | NIL | NIL | NIL | NIL | NIL | NIL |
| Wages | 5 | 0 | NIL | NIL | NIL | NIL |
| Other human rights related issues (breach of Code of Conduct, Suspected Fraud, Bribery/ Kickbacks) | 8 | 4 | Complaints could not be investigated due to incomplete details. Reminders were sent to the Complainants via Navex Tool to share their contact details as well as details relating to the accused so that investigating team would be in a position to investigate the matters. No response has been received from the Complainant yet. | 9 | 9 | NIL |

7 Mechanisms to prevent ad-verse consequences to the complainant in discrimination and harassment cases.

As mentioned in our Code of Conduct, the Company and all its affiliate Companies shall provide equal opportunities to all its employees / Personnel and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, work experience, gender, sexual orientation, age, nationality, ethnic origin or disability. We have adopted policies which reinforce to the stakeholders, who raise complaints on a concrete and reasonable belief about a violation, that they will not be subjected to any kind of retaliation such as discrimination, reprisal, harassment, victimization etc. irrespective of the concern being ultimately substantiated.

The Company has zero tolerance for any kind of harassment and discrimination. Our Human Resource policies and Code of Conduct promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Employee policies and practices are administered in a manner consistent with applicable laws and other provisions of this Code, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit.

In addition, The POSH Policy has been formed under the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment. In case any allegations of sexual harassment are substantiated by the ICC, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

The Company also has a whistle blower mechanism that empowers its employees to raise the concerns, if any, for the instances like bribery, suspicion of corruption, behavioural issues, discrimination etc via this vigil mechanism. Complaints reported to any internal stakeholder (reporting manager/ HR team/ Compliance Officer) of any potential violation shall be channelled to the whistle blowing mechanism, immediately. The identity of the complainants shall remain confidential during the investigation. The Company has enabled the web portal "Navex Global" to take anonymous complaints and facilitate reporting of the protected disclosures routed through the web links, toll-free number and application access mentioned in detail on the Intranet, Deep Purple. The Company will timely investigate all the complaints reported under the whistle blowing mechanism after the due approval from a member of the Disciplinary Action Committee. The investigating team shall ensure compliance with all the regulatory requirements during the course of investigation. After the completion of the investigation, a report shall be submitted with recommended measures to the Disciplinary Action Committee. The Disciplinary Action Committee shall initiate disciplinary actions as appropriate based on the findings and recommendations of such a report. The committee would be guided by the existing Consequence

management Policy. The details of the same are also available in the ABAC Policy as available on the Company's website.

The organization on a regular basis sensitises its employees on the prevention of sexual harassment at the workplace through workshops, group meetings, online training modules and awareness programmes which are held on a regular basis.

8 Do human rights requirements form part of your business agreements and contracts?

(Yes/No)

Yes, our Code of Conduct is applicable to all our employees, employees of service providers or vendors, employees of business partners, consultants, retainers, trainees or any individual engaged providing services to the Company who have to comply with all applicable laws, including labour laws which forms a part of our vendor/service provider contracts and business requirements.

9 Assessment for the Year

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|--|
| Child Labour | NIL |
| Forced/involuntary labour | NIL |
| Sexual Harassment | NIL |
| Discrimination at workplace | NIL |
| Wages | NIL |
| Others, please specify | NIL |

10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

Not Applicable. Although, we internally make sure to amend and follow compliances from time to time.

Leadership Indicator

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes

4. Details on assessment of value chain partners:

| | % of value chain partners (by value of business done with such partners) that were assessed |
|----------------------------------|--|
| Sexual Harassment | This is currently not explicitly assessed or measured. |
| Discrimination at workplace | |
| Child Labour | |
| Forced Labour/Involuntary Labour | |
| Wages | |
| Others – please specify | |

Note: Terms and conditions incorporated in the Purchase order are already described and value chain partners are expected to follow terms and conditions

Our Code of Conduct applies to all directors and employees of the Company, its subsidiaries and its affiliates, and employees of service providers or vendors, employees of business partners, consultants, retainers, trainees or any individual engaged providing services within the Company's premises.

Principle 6: Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|--|---|--|
| Total electricity consumption (A) | 10,747.44 GJ | 6,197.47 GJ |
| Total fuel consumption (B) | 39,961.30 GJ | 8,526.96 GJ |
| Energy consumption through other sources (C) | - | - |
| Total energy consumption (A+B+C) | 50,708.74 GJ | 14,724.43 GJ |
| Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees) | 841.22 J/₹ | 378.29 J/₹ |
| Energy intensity (optional) - the relevant metric may be selected by the entity | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Not applicable

3. Provide details of the following disclosures related to water, in the following format:

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|---|---|--|
| Water withdrawal by source (in kilolitres) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | - | - |
| (iii) Third party water – Packaged drinking water | 515 | 344 |
| (iv) Seawater / desalinated water | - | - |
| (v) Others - Municipal Supply | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 515 | 344 |

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|---|---|--|
| Total volume of water consumption (in kilolitres) | 515 | 344 |
| Water intensity per rupee of turnover (Water consumed / turnover) | 0.00000854 L/₹ | 0.00000884 L/₹ |
| Water intensity (optional) - the relevant metric may be selected by the entity | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Not applicable

5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

| Parameter | Please specify unit | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|-------------------------------------|---------------------|---|--|
| NOx | TPY | 35.75 | 7.81 |
| SOx | TPY | 0.50 | 0.12 |
| Particulate matter (PM) | TPY | 0.94 | 0.20 |
| Persistent organic pollutants (POP) | TPY | Not being tracked | |
| Volatile organic compounds (VOC) | TPY | 4.64 | 1.00 |
| Hazardous air pollutants (HAP) | TPY | 0.0372 | 0.0082 |
| Others– please Specify (CO) | TPY | 23.03 | 4.91 |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

| Parameter | Unit | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|--|-----------------------|---|--|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 4,150.42 | 4,344.56 |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | tCO ₂ e | 2,125.01 | 1,185.42 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | KgCO ₂ e/₹ | 0.000104 | 0.000142 |
| Total Scope 1 and Scope 2 emission intensity (optional) - the relevant metric may be selected by the entity | - | - | - |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

7. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.

We proudly represent our country in international forums, actively promoting sustainability efforts. Since December 2017, our CEO, Mr. Vijay Shekhar Sharma, has served as the United Nations Environment Programme's ("UNEP") Patron for Clean Air, playing a key role in driving environmental action and awareness. He advocates for UNEP's global #BreatheLife campaign, a significant initiative focused on improving air quality and encouraging policy changes and citizen involvement for a healthier future. Additionally, our Founder sits on the Advisory Board of the Green Digital Finance Alliance, established by Ant Financial Services and UNEP. This alliance aims to leverage digital finance and fintech-powered innovations to reshape the financial system, aligning it more effectively with the goals of sustainable development.

We are committed to adopting environmentally friendly practices in all our major offices to conserve energy. This includes using LED lights, prohibiting one-time use plastic, employing energy-efficient appliances, and implementing sensor-based water faucets and lighting systems in toilets, among other initiatives.

8. Provide details related to waste management by the entity, in the following format:

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|--|---|--|
| Total Waste generated (in metric tonnes) | | |
| Plastic waste (A) | Not applicable | Not applicable |
| Flexible Plastic Waste | 59 MT | NA –Authorization applied in the year 2022 |
| E-waste (B) | 129.01 MT* | 9.32 MT |
| Bio-medical waste (C) | Not applicable | Not applicable |
| Construction and demolition Waste (D) | Not applicable | Not applicable |
| Battery waste (E) | 1.06 MT | 0.90 MT |
| Radioactive waste (F) | Not applicable | Not applicable |
| Other Hazardous waste. Please specify, if any. (G) | Not applicable | Not applicable |
| Non-hazardous waste. Please specify, if any. (H) (Break-up by composition i.e., by materials relevant to the sector) – | 13 MT | Data not captured for the last FY |
| 1) Dry and wet waste (tissues, paper napkins, food leftovers, tea bags etc.) | | |
| 2) Paper, magazines, cardboards, etc. | | |
| Total (A+B + C + D + E + F + G+ H) | 202.07 MT | 10.22 MT |
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste | | |
| (i) Recycled | 202.07 MT | 10.22 MT |
| (ii) Re-used | 0 | 0 |
| (iii) Other recovery operations – Coprocessing, Incineration with energy recovery | 0 | 0 |
| Total | 202.07 MT | 10.22 MT |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | NIL | NIL |
| (ii) Landfilling | NIL | NIL |
| (iii) Other disposal operations | NIL | NIL |
| Total | NIL | NIL |

*The increase in electronic waste produced during the fiscal year 2022-23 can be attributed to Paytm's soundbox collection, retrieval, and upgrade campaign.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

The nature of the Company's business does not involve the use of hazardous or toxic chemicals. To handle e-waste responsibly, the Company has established comprehensive systems across all its locations in India.

Our commitment to environmental responsibility extends to the disposal of e-waste assets, which are managed through a systematic process. We strictly adhere to our comprehensive E-Waste Policy, ensuring the proper disposal of E-waste resulting from our business activities. To meet these standards, we collaborate with e-waste vendors listed by CPCB, assuring responsible and compliant e-waste management practices throughout our operations. Additionally, the Company has formulated a comprehensive waste collection plan in strict adherence to the Extended Producer Responsibility (EPR) plan submitted to CPCB.

To effectively manage other waste, the Company segregates and stores generated waste into two categories: dry waste and wet waste. Suitable bins are used for this purpose. All wastes generated in our premises is carefully managed through our partnership with Government authorized agencies equipped with sorting and processing units.

10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

| S. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any. |
|--------|--------------------------------|--------------------|---|
| 1 | NIL | NIL | There are no offices and/or operating sites in or around ecologically sensitive areas where environmental approvals are required. |

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|-----------------------------------|----------------------|------|---|--|-------------------|
|-----------------------------------|----------------------|------|---|--|-------------------|

NA. As per the Environmental Impact Assessment (EIA) Notification 2006 environmental impact assessment is to be done by the third-party consultants for new projects only, the conditions are: built up area for covered construction $\geq 20,000$ sq.mtrs and $< 1,50,000$ sq.mtrs.

Since all offices have built-up area lesser than threshold, there is no requirement to undertake EIA.

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

The Company is in compliance with all applicable environmental laws.

| S. No. | Specify the law / regulation / guidelines which was not complied with | Provide details of the non-compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken if any |
|--------|---|---------------------------------------|---|--------------------------------|
| | NIL | NA | NA | NA |

Leadership Indicators

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|---|---|--|
| From renewable sources | | |
| Total electricity consumption (A) | NIL | NIL |
| Total fuel consumption (B) | NIL | NIL |
| Energy consumption through other sources (C) | NIL | NIL |
| Total energy consumed from renewable sources (A+B+C) | NIL | NIL |
| From non-renewable sources | | |
| Total electricity consumption (D) | 10,747.44 GJ | 6,197.47 GJ |
| Total fuel consumption (E) | 39,961.30 GJ | 8,526.96 GJ |
| Energy consumption through other sources (F) | NIL | NIL |
| Total energy consumed from non-renewable (D+E+F) | 50,708.74 GJ | 14,724.43 GJ |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment/evaluation/assurance carried out by an external agency during the year.

2. Provide the following details related to water discharged:

At all our operating sites, the effluents are treated through primary, secondary and tertiary systems and are reused in the process and domestic purpose.

| Parameter | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|--|---|--|
| Water discharge by destination and level of treatment (in kilolitres) | | |
| (i) To Surface water | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (ii) To Groundwater | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (iii) To Seawater | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (iv) Sent to third-parties | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| (v) Others | NA | NA |
| - No treatment | | |
| - With treatment – please specify level of Treatment | | |
| Total water discharged (in kilolitres) | NA | NA |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment was carried out by an external agency during the year.

4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

| Parameter | Unit | FY 22-23 (Current Financial Year) | FY 21-22 (Previous Financial Year) |
|---|---------------------------------|---|--|
| Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes of CO2 equivalent | Not Done | Not Done |
| Total Scope 3 emissions per rupee of turnover | | Not Done | Not Done |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity | | Not Done | Not Done |

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No assessment being done.

5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not applicable

6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|--------|-----------------------|--|---|
| 1 | Paytm Soundbox | Paytm Soundbox provides instant audio confirmation for the amount received. It also has our All-in-One QR Code, enabling merchants to accept payments from multiple instruments like Paytm Wallet, Debit & Credit Cards, Net Banking and Paytm UPI. The feature is available in 11 languages (English, Hindi, Kannada, Telugu, Tamil, Malayalam, Punjabi, Marathi, Gujarati, Bangla, Odia), which facilitated its usage across the country. | In last FY (01 April 2022- 31 March 2023), a total of 13721 million Sound-box-based transactions have been completed through Paytm-enabled Sound boxes. This has enabled saving paper slips worth 12.07 million pounds in last one year. (Considering each paper slip 5.7cm*10 cm, having 70 GSM paper) |

7. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

The Company has a disaster management plan which defines the procedures to be followed in the event of a natural or man-made emergencies or disasters, political turmoil or criminal action which affects business operations and develops into emergency events. The Disaster Management Plan outlines the procedures to be followed in such event.

The Emergency Response Plan (ERP) process document covers the following aspects--:

- Formation of ERT (emergency response team): An Emergency Response Team (ERT) is a group of people who prepare for and respond towards any emergency incident. Natural calamities and unnatural disasters could be fires, explosions, the release of potentially toxic chemicals, falls from height, confined space incidents, acts of terrorism, etc. The ERT provides knowledge & awareness in building experience through an overview of emergency preparedness-related requirements.

- Formation QRT (Quick response team): Quick Response Team shall operate on 24/7 basis as first responder and consists of one driver and two Civil Defence Volunteers trained in firefighting, search & rescue, first aid, etc. During a fire or other emergency, the Emergency Coordinator has primary responsibility for assisting firefighters and emergency personnel and coordinating the response of the staff and systems. Other responsibilities include designating and training of QRT in fire prevention technique.
- Incident Report: An incident report is a thorough documentation of the incident, including all relevant details that caused it and any outcomes reported. The incidents are required to be recorded & documented to serve as a guideline, in order to prepare, prevent and minimize the impact of such emergencies in future.

PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

The Company is affiliated to ten trade and industry chamber/associations.

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|--------|---|---|
| 1 | Associated Chambers of Commerce and Industry of India (ASSOCHAM) | National |
| 2 | International Chamber of Commerce (ICC) | National |
| 3 | National Association of Software and Services Companies (NASSCOM) | National |
| 4 | Internet & Mobile Association of India (IAMAI) | National |
| 5 | Confederation of Indian Industry (CII) | National |
| 6 | Payments Council of India (PCI) | National |
| 7 | Fintech Convergence Council (FCC) | National |
| 8 | Federation of Indian Chambers of Commerce and Industry (FICCI) | National |
| 9 | Alliance of Digital India Foundation (ADIF) | National |
| 10 | Advertising Standards Council of India | National |

2 Provide details of corrective action taken or underway on any issues related to anti- competitive conduct by the entity, based on adverse orders from regulatory authorities.

| Name of Authority | Brief of the Case | Corrective action taken |
|--|-------------------|-------------------------|
| There were no incidents of anti-competitive behaviour involving the Company during the reporting period (2022-23). | | |

Leadership Indicators

1. Details of public policy positions advocated by the entity:

| S. No. | Public Policy Advocated | Method resorted for such advocacy | Whether information available in public domain (yes/no) | Frequency of Review (Annually/ Half yearly/ Quarterly/ Others– please specify) | Web-link, if available |
|--------|--|---|---|--|------------------------|
| 1. | Submitted inputs on draft Digital Personal Data Protection Bill | Submission to Ministry of Electronics and Information Technology (MeitY), submission to Industry bodies | No | NA | NA |
| 2 | Submission requesting introduction of a new category of IoT devices for incentives under NABARD's Financial Inclusion Fund scheme and RBI's Payments Infrastructure Development Scheme | Submission to industry bodies | No | NA | NA |
| 3 | Submission of detailed response to Telecom Regulatory Authority (TRAI) for implementation of Calling Name Presentation (CNAP) implementation for Telecom Networks in India. | Submission to TRAI | No | NA | NA |
| 4 | Submission to MeitY and Ministry of Home Affairs for implementation of Whitelisting for Fintech platforms on social media platforms | Submission to MeitY and Ministry of Home Affairs | No | NA | NA |

Statutory Reports

Business Responsibility
& Sustainability Report

| S. No. | Public Policy Advocated | Method resorted for such advocacy | Whether information available in public domain (yes/no) | Frequency of Review (Annually/ Half yearly/ Quarterly/ Others- please specify) | Web-link, if available |
|--------|---|---|---|--|---|
| 5 | Submission to Dept. of Telecommunications for removal of restrictions on M2M SIM cards used in IOT based payment acceptance devices. | Submission to Dept. of Telecommunications | No | NA | NA |
| 6 | Oral evidence to 'Parliamentary Standing Committee on Finance' on the subject 'Anti-competitive practices by Big Tech companies' | Oral evidence and Direct submission of response to Parliamentary Standing Committee | Yes | NA | https://loksabhadocs.nic.in/lsscommittee/Finance/17_Finance_53.pdf |
| 7 | Response to 'Standing Committee on Communications & IT' on subject 'Digital Payment and online security measures for data protection' | Direct submission to Standing Committee | No | NA | NA |

Principle 8: Businesses should promote inclusive growth and equitable development

Essential Indicator

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

| Name and brief details of the Project | SIA notification Number | Date of Notification | Weather conducted by independent external Agency (Yes or No) | Result communicated in Public Domain (Yes/No) | Relevant Weblink |
|---------------------------------------|-------------------------|----------------------|--|---|------------------|
|---------------------------------------|-------------------------|----------------------|--|---|------------------|

No such project was initiated in the current financial year which requires Social Impact Assessment.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

| S. No. | Name of the Project for which R&R is going | State | District | Number of projects Affected Families | % of PAFs covered by R&R | Amount Paid to PAFs in FY (In ₹) |
|--------|--|-------|----------|--------------------------------------|--------------------------|----------------------------------|
|--------|--|-------|----------|--------------------------------------|--------------------------|----------------------------------|

NA

3. Describe the mechanisms to receive and redress grievances of the community.

Given the nature of the business, this is not applicable to the Company.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

| | FY 22-23 Current Financial Year | FY 21-22 Previous Financial Year |
|--|---------------------------------------|--|
| Directly sourced from MSMEs/ small producers | NA | NA |
| Sourced directly from within the district and neighbouring districts | NA | NA |

Leadership Indicator

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

| Details of negative social impact Identified | Corrective Action Taken |
|--|-------------------------|
| Not applicable | |

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

| S. No. | State | Aspirational district * | Amount spent (in ₹) |
|--------|---|-------------------------|---------------------|
| 1. | UNEP - Air Quality Action Forum Paytm Foundation in collaboration with UNEP has set up AQAF (Air Quality Action Forum). Till now under AQAF, consultation meetings have been organized with 80+ stakeholders on various issues concerning air pollution and solutions that could lead to preventing air pollution. Our Reach - Pan India | No | 1,01,25,000 |
| 2. | Strengthening rural education and promoting digital skilling - Distribution of 150 laptops and dongles for education, research, digital skilling or overall growth and benefit to more than 2500 direct beneficiaries Our Reach – Himachal Pradesh | No | 59,39,730 |
| 3. | Shikshit Bharat - An initiative by Paytm Foundation promoting education and digital literacy by donating 10 laptops to underprivileged students. Our Reach – Himachal Pradesh | No | 30,000 |

* Projects have been undertaken through Paytm Foundation in other districts.

Note: Even though the funds were released in FY 2022 - 2023, for the iTNT hub (as called out in the Board Report section of this Annual Report), the hub was inaugurated on 15th May 2023. Therefore the beneficiaries have not been identified here.

3a Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

No

3b From which marginalized /vulnerable groups do you procure?

There is a Procurement Policy in place, but the nature of business limits such purchases. During the year, the Company procured various articles from NGOs. These organizations serve communities from marginalized backgrounds.

3c What percentage of total procurement (by value) does it constitute?

NA

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

| S. No. | Intellectual property based on traditional knowledge | Owned/Acquired (Yes/No) | Benefits Shared Yes or No | Basis of calculating benefits share |
|--------|--|-------------------------|---------------------------|-------------------------------------|
|--------|--|-------------------------|---------------------------|-------------------------------------|

Not applicable

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

| Name of the Authority | Brief of the case | Corrective Action taken |
|-----------------------|-------------------|-------------------------|
|-----------------------|-------------------|-------------------------|

Not applicable

6. Details of beneficiaries of CSR Projects:

| S. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalized groups |
|--------|--|---|--|
| 1 | Shikshit Bharat | 30+ | 100% |
| 2 | Strengthening rural education and promoting digital skilling | 2500+ | NA |
| 3 | UNEP Air Quality Action Forum (AQAF) | NA | NA |

Principles 9 Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

- 1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

Grievance redressal-Lending

We have formulated an escalation matrix to ensure that concerns of the consumers are routed and addressed by the right team. The below escalation matrix is available for the consumers to read and understand in order to ensure a timely redressal of their concerns.

The Company recommends them to carefully go through the help pages that provide self-help to the customers. For queries and concerns that are not addressed through the help pages, the customers can contact the customer support team through the Paytm App. In order to create a ticket, they can click on the below links based on the Product.

Postpaid –

Social Media Twitter Handle - @Paytmcare

24*7 In App Support - https://m.paytm.me/paytm_post

Personal Loan -

Social Media Twitter Handle - @Paytmcare

24*7 In App Support - <https://m.paytm.me/ccloan>

Co-Branded Credit Cards

Social Media Twitter Handle - @Paytmcare

24*7 In App Support – https://m.paytm.me/paytm_crecard

Merchant Cash Advance

24*7 In App Support – https://b.paytm.me/Help_Support (Please use via Mobile)

Call Center - 0120-4440440

Social Media –

<https://twitter.com/PaytmBusiness>

<https://www.facebook.com/Paytmforbusiness>

<https://www.instagram.com/paytmbusiness/>

<https://www.linkedin.com/company/paytm-for-business/>

Our in-app support channel is able to resolve a vast majority of customer complaints. In any uncommon scenario, where one wishes to escalate the concern to next level, one needs to ensure that they have already exhausted the previous level(s) and their concern remains un-resolved or not resolved to their satisfaction.

Service Levels

Service Levels for Lending Products

Level 1

Complaints Registration:

- One can register complaint with our Customer Support by clicking on any of the above links.
- We offer customer support service 24 hours a day and 7 days a week.

Resolution of Complaints:

- We are committed to providing customers with our first response within 24 hours of receiving the complaint.
- Resolution of the complaint may get delayed due to operational or technical reasons. In such a scenario, concerned customers will be proactively informed of the timelines during which their complaint will be addressed.
- Complaints related to 'Suspected Fraud' often take longer to investigate due to the involvement of multiple agencies. The resolution time in such cases is dependent on the severity and complexity of the case. One shall be proactively informed of the timelines in such cases.

Level 2

1. Complaints Registration: Before reaching out to Level 2, we request the customers to contact Level 1 support channels mentioned above. If they have already reached out to Level 1 and have not received a satisfactory resolution, they can share the details of their complaint on the below e-mail ID.
2. Important Note – Complainant will need to mention the Level 1 Ticket # in the subject line of the e-mail. If complainant does not have a Level 1 ticket #, they can always raise a ticket using the links. Any complaint at Level 2 will not be entertained if the Level 1 ticket number is not mentioned.
 - One can register a complaint on grievance-redressal_lending@paytm.com.
3. Resolution of Complaints:
 - We are committed to providing a first response within 24 hours of receiving the complaint.
 - We aim to resolve all Level 2 complaints within 3 business days. Any delay in the resolution time shall be proactively communicated to the concerned customer.

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

| | As a percentage to total turnover |
|--|-----------------------------------|
| Environmental and social parameters relevant to the products | NA |
| Safe and responsible usages | NA |
| Recycling and /or safe disposal | NA |

3. Number of consumer complaints in respect of following:

| Category | FY 22-23 (Current Financial Year) | | | FY 21-22 (Previous Financial Year) | | |
|--------------------------------|--------------------------------------|---------------------------------------|---------|---------------------------------------|---------------------------------------|---------|
| | Received during the year | Pending resolution at the end of year | Remarks | Received during the year | Pending resolution at the end of year | Remarks |
| Data privacy | 6 | 2 | - | 0 | 0 | - |
| Advertising | 5 | 0 | - | 0 | 0 | - |
| Cyber-security | 0 | 0 | - | 0 | 0 | - |
| Delivery of Essential Services | - | - | - | - | - | - |
| Restrictive Trade Practices | - | - | - | - | - | - |
| Unfair Trade Practices | - | - | - | - | - | - |
| Other | 9,900 | 52 | - | 1,784 | 35 | - |

4. Details of instances of product recalls on account of safety issues:

| | Number | Reasons for Recall |
|-------------------|--------|--------------------|
| Voluntary recalls | | NIL |
| Forced recalls | | |

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes.

Privacy Policy (paytm.com)

<https://paytm.com/company/terms-and-conditions?company=one97&tab=privacy>

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

No penalties/regulatory action has been levied or taken on the above-mentioned parameters.

Leadership Indicator

| | | |
|---|---|--|
| 1 | Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available). | <p>Customer awareness articles and campaigns on Print and social media Through its various campaigns, the Company has ensured that its users get the right information and are made aware of all the features that make their life simpler. We regularly update users with information to prevent cyber frauds through the app, social media, blogs and articles.</p> <p>Blogs: Paytm QR and Paytm UPI Are Free: Understanding the Latest NPCI Circular On Wallet Interoperability With UPI https://paytm.com/blog/payments/upi/paytm-qr-and-paytm-upi-are-free-understanding-the-latest-npci-circular-on-wallet-interoperability-with-upi/ Paytm UPI LITE now active on these 10 banks for lightning-fast payments https://paytm.com/blog/payments/paytm-upi-lite-now-active-on-these-10-banks/ Launching Cancel Protect for Train Tickets – Empowering Users with 100% Refund on Cancellation, Avail Instant Refund With No Questions Asked Policy https://paytm.com/blog/investor-relations/paytm-empowers-users-to-get-100-refund-on-cancellation-of-train-tickets-with-cancel-protect-provides-instant-refund-with-no-questions-asked-policy/ How to Set up a UPI Lite Account on Paytm? https://paytm.com/blog/payments/upi/how-to-set-up-a-upi-lite-account-on-paytm/ The company signed MoU with Government of Andhra Pradesh at Global Investors Summit 2023, to drive initiatives in Financial Inclusion, Public Health, Cyber Security https://paytm.com/blog/payments/corporate/paytm-signs-mou-with-government-of-andhra-pradesh-at-global-investors-summit-2023/ Announcing our collaboration with MeitY for ‘G20-Stay Safe Online’ Campaign, to drive greater awareness among citizens on Cyber Safety https://paytm.com/blog/payments/our-collaboration-with-meity-for-g20-stay-safe-online-campaign/ India’s Pioneer in Digital Payments Paytm Launched UPI LITE for Seamless UPI Transactions https://paytm.com/blog/payments/upi/paytm-launched-upi-lite-for-seamless-upi-transactions/</p> |
|---|---|--|

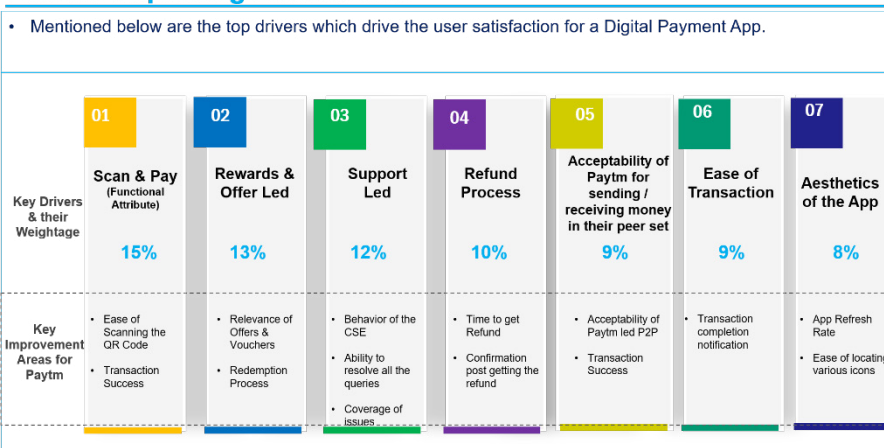
| | | |
|---|---|--|
| | | <p>Simplify Loan Repayment with Paytm’s EMI Options https://paytm.com/blog/loan/loan-repayment-with-paytms-emi-options/</p> <p>We are truly the Pioneer of QR Payments – How We Are Enabling India’s Small Vendors https://paytm.com/blog/investor-relations/paytm-is-truly-the-pioneer-of-qr-payments-how-we-are-enabling-indias-small-vendors/</p> <p>How does Credit Score Help in Availing Loan? https://paytm.com/blog/credit-score/how-does-credit-score-help-in-availing-loan/</p> <p>Guide to Pradhan Mantri Garib Kalyan Yojana https://paytm.com/blog/saving-schemes/guide-to-pradhan-mantri-garib-kalyan-yojana/</p> <p>Pradhan Mantri Awas Yojana Scheme: Documents Required, Eligibility & Features https://paytm.com/blog/saving-schemes/government-schemes/pmay-pradhan-mantri-awas-yojana-scheme/</p> <p>Short Term FD Vs Long Term FD- Which is the Better Option of Investment? https://paytm.com/blog/fixed-deposit/short-term-fd-vs-long-term-fd/</p> <p>Detect Fake SMSs within Seconds! https://paytm.com/blog/paytm-help/how-to-detect-fake-sms/</p> <p>New Income Tax Slab Rates for FY 2023-24 https://paytm.com/blog/income-tax/check-the-new-income-tax-slabs-update/</p> <p>Key Highlights & Takeaways of Union Budget https://paytm.com/blog/tax/key-highlights-of-union-budget/</p> |
| 2 | Steps taken to inform and educate consumers about safe and responsible usage of products and/or services. | We comply with all disclosure requirements relating to its products and services, as per AMFI/SEBI guidelines. Furthermore, the Company proactively takes measures to educate its customers and issues general advisory to all users to protect them from malicious activities such as cyber fraud. |
| 3 | Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services | We proactively inform our customers whenever in case of out-ages through SMS and our app. Communications on any dis-ruption/ discontinuation of essential services, albeit rare, are in-timated to customers through emails, call centres, the Company’s website and other modes of electronic communication. |

4 Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/ No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/ No)

Our primary research work includes surveys and in-depth interviews of consumers, customers and other relevant ecosystem participants, and consultations with market participants and experts. In addition to the primary research, quantitative market information is also derived based on data from trusted portals and industry publications. We seek feedback from our customers quarterly and customer complaints/grievances are reviewed for a root cause analysis, which also gives opportunity to improve the services.

Annual Customer Surveys are conducted and the recent customer survey shows

Drivers impacting Satisfaction



The drivers that impact the overall satisfaction are taken into account and the teamwork towards improving the gaps

5 Provide the following information relating to data breaches:
a. Number of instances of data breaches along-with impact
b. Percentage of data breaches involving personally identifiable information of customers

a) No cases
b) The Company did not witness any instances of data breaches during the year. We also have cyber risk insurance policies